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E. DANYA PERRY Founding Partner 212-840-7939 PHONE dperry@danyaperrylaw.com email

July 25, 2025

VIA ECF

Hon. Valerie E. Caproni United States District Court Southern District of New York 500 Pearl St. New York, New York 10007



Re: USA v. Curtis Williams, 24-cr-696 (VEC)

Dear Judge Caproni:

I am counsel for Defendant Curtis Williams in the above-captioned case, having been appointed pursuant to the Criminal Justice Act. I write to respectfully submit that there is good cause in the interests of justice to appoint a non-CJA panel attorney at my firm, Kenneth Crouch (No. 5837570), as associate counsel to assist me in various aspects of the above-captioned case.

Mr. Crouch is admitted to practice before this Court. He began his career as an appellate public defender in New York state's intermediate appellate courts, appearing on behalf of indigent clients in front of the First Department Appellate Term and Appellate Division. His experience also includes the investigation and prosecution of police officers accused of professional misconduct as a prosecutor with the New York City Civilian Complaint Review Board. He is currently an Associate at Perry Law.

Mr. Crouch has been critical in the defense of Mr. Williams thus far, liaising with U.S. Pretrial Services and evaluating a variety of potential defense theories. His continued involvement is needed in this matter to assist in the preparation of any pretrial submissions, to prepare for trial in this matter, and to continue to maintain communication with Mr. Williams. If the Court grants this application, it is respectfully requested that Mr. Crouch be appointed as an associate attorney at the CJA rate of \$138.00 per hour to assist in this case, nunc pro tunc, to December 17, 2024.

We appreciate Your Honor's consideration.

Sincerely,

/s/ E. Danya Perry

E. Danya Perry (No. 2839983)
Perry Law
445 Park Avenue, 7th Floor
New York, NY 10022
Email: dperry@danyaperrylaw.com

The Honorable Valerie E. Caproni July 25, 2025

Telephone: (212) 840-7939 Facsimile: (646) 849-9609

Attorney for Defendant Curtis Williams

Application GRANTED. Kenneth Crouch is appointed as an associate attorney to assist CJA counsel E. Danya Perry at the CJA Rate of \$138.00 per hour.

7/28/2025

SO ORDERED.

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE